

InnovateSphere Inc. – Code of Conduct

This Code of Conduct outlines the standards of behavior expected from all InnovateSphere Inc. employees. It covers professional integrity, conflicts of interest, and data security requirements. All employees are required to familiarize themselves with these guidelines and adhere to them in their daily operations to maintain our company's reputation and values.

Code of Conduct
IN DISC PAGE

Professional Integrity

At InnovateSphere Inc., we are committed to conducting business with the highest level of integrity and ethical standards. All employees must uphold these principles in every aspect of their professional activities and relationships, both internally and with external stakeholders.

Bribery, corruption, and unethical business practices in any form are strictly prohibited. This includes offering, giving, soliciting, or receiving improper payments, gifts, or favors intended to influence business decisions or gain unfair advantages.



Honest Dealings

Conduct all business relationships with honesty, fairness, and transparency. Maintain accurate records of all transactions and communications.



Legal Compliance

Comply with all applicable laws, regulations, and company policies. Report any suspected violations promptly through appropriate channels.



Ethical Decision-Making

When faced with difficult situations, use ethical frameworks to guide decisions. Consider impacts on all stakeholders before taking action.

Conflict of Interest

Employees must maintain clear boundaries between personal interests and company responsibilities. A conflict of interest arises when an employee's personal activities, relationships, or financial interests potentially interfere with their ability to act in the best interest of InnovateSphere.

What Constitutes a Conflict

- Financial interests in competitor companies
- Personal relationships with clients or vendors
- Outside employment affecting job performance
- Using company resources for personal gain

Gift Policy

- Gifts valued under \$100 may be accepted
- Gifts over \$100 must be reported to HR
- Lavish gifts from clients are prohibited
- Gift cards must follow same guidelines

Disclosure Requirements

- Proactively disclose potential conflicts
- Submit annual conflict disclosure form
- Update disclosures when circumstances change
- Consult with manager when uncertain

Data Security

All employees share responsibility for protecting InnovateSphere's valuable data assets and our customers' confidential information. Security breaches can result in significant financial losses, regulatory penalties, and irreparable damage to our reputation and customer trust.



Company Equipment Policy

- Use only company-issued laptops for work
- Keep all devices updated with security patches
- Report lost or stolen equipment immediately



Prohibited Practices

- Accessing company data on personal devices
- Installing unauthorized software
- Sharing login credentials with others



Information Classification

- Identify sensitive information appropriately
- Apply proper handling procedures by classification
- Limit sharing to authorized personnel only



Best Practices

- Use strong, unique passwords
- Enable two-factor authentication
- Be vigilant against phishing attempts

Violations of these data security protocols may result in disciplinary action up to and including termination. All potential security incidents must be reported immediately to the IT Security team at security@innovatesphere.com.